United States District Court

		McAL	LEN DIVIS	ION		· <u> </u>	
UNITED STATES	OF AMI	ERICA					NINIT
V.		•			CKIMINA	AL COMPLA	AIIN I
Noohr Ayoubi		PRINCIPAL	USC			Case Nur	nber:
	YOB:	1996				M-20-579	- M
					,		
(Name and Address of Defendant)						' ,	
I, the undersigned com	plainant b	eing duly swor	rn state the follow	ving is true an	d correct to the	e best of my	
-	-		1 RIG	_		•	-
knowledge and belief. (_	March 2, 2020	in _	Hidalgo	County,	
the South (Track Statutory Langu		_	trict of	Texas		defendants(s) did	l,
knowing or in reckles Rocche, citizens and	national	of Guatemala	, along with thr	ee (3) other u	ndocumente	d aliens, for a to	tal of five
(5), who had entered transport said aliens near Los Ebanos, Te	in further	ance of such	violation of law	within the U			
in violation of Title	8		s Code, Section()(1)(A)(ii)	FELONY	
I further state that \overline{I}							
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following facts:				-			
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Case 7:20-mj UNTTED STATES DISTRICT COURTXSD Page 2 of 2 SOUTHERN DISTRICT OF TEXAS McALLEN, TEXAS

ATTACHMENT TO CRIMINAL COMPLAINT:

M-20-579 -M

RE:

Noohr Ayoubi

A213 260 865

CONTINUATION:

Principal Statement:

Noohr Ayoubi, a United States Citizen, was read his Miranda Rights. He stated he understood his rights and was willing to answer questions without the presence of an attorney.

Ayoubi stated he was offered \$1,000.00 from a subject known as "Leon" to transport undocumented aliens from Los Ebanos, Texas to an unknown place in McAllen, Texas. Ayoubi stated he was going to get paid once he delivered the undocumented aliens. Ayoubi stated he was told by an unknown subject driving a mustang to follow the silver mercedes and pick up the undocumented aliens and that he was told to also load up subjects in the trunk of his car but he opted not to.

Material Witnesses Statement:

Cristino Rodrigo Garcia-Ortega, a citizen of Guatemala, was read his Miranda Rights. He stated he understood his rights and was willing to answer questions without the presence of an attorney.

Garcia-Ortega stated he left his home country of Guatemala on February 16, 2020. Garcia stated he arrived at the border town of Diaz Ordaz and encountered other subjects who were also going to cross illegally into the United States. Garcia stated they paid \$500 Mexican Pesos to be crossed on an inflatable raft. Garcia stated that once they made their illegal entry into the United States they ran into the brush and got inside a vehicle. Garcia stated the driver of the vehicle was a male subject, wearing glasses and had a beard. Garcia stated the driver told them to give him money for gas but that there was no time to pay for it as they were stopped by Border Patrol shortly thereafter.

Gerson Benedicto Samol-Rocche, a citizen of Guatemala, was read his Miranda Rights. He stated he understood his rights and was willing to answer questions without the presence of an attorney.

Samol-Rocche stated after his left his home country of Guatemala he arrived at the border town of Diaz Ordaz. Samol stated he encountered other subjects and decided to cross into the United States. Samol stated they crossed on an inflatable raft. Samol stated that once they made their illegal entry into the United States they ran alongside the brush and got inside a vehicle. Samol stated the driver of the vehicle was a male subject, wearing glasses and was light completed. Samol stated the driver said "GO, GO, GO" in a loud voice.